

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Execware, LLC,

Plaintiff,

v.

Amazon.com; CDW Corporation; CDW LLC  
Marriott International, Inc.; Staples, Inc.;  
Starwood Hotels & Resorts Worldwide, Inc.;  
and Travelocity.com LP,

Defendants.

Civil Action No. 11-836-LPS

DEMAND FOR JURY TRIAL

FIRST AMENDED COMPLAINT

Plaintiff Execware, LLC ("Execware") alleges as follows:

PARTIES

1. Execware is a limited liability company organized under the laws of the Commonwealth of Virginia, having its principal offices at 3440 S. Jefferson Street #1125, Falls Church, Virginia 22041.

2. Defendant Amazon.com ("Amazon") is a Delaware corporation with its principal place of business at 410 Terry Avenue North, Seattle, Washington 98109. Amazon has appointed Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808 as its agent for service of process.

3. On information and belief, Defendant CDW Corporation is a Delaware corporation with its principal place of business at 200 N. Milwaukee Avenue, Vernon Hills, Illinois 60061. On information and belief, Defendant CDW LLC (collectively with CDW Corporation, "CDW") is an Illinois limited liability company with its principal place of business at 200 N. Milwaukee Avenue, Vernon Hills, Illinois 60061. CDW Corporation has appointed Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808 as its agent for service of process. CDW LLC may be served pursuant to the Delaware long arm statute, 10 *Del. C.* § 3104.

4. On information and belief, Defendant Marriott International, Inc. ("Marriott") is a Delaware corporation with its principal place of business at 10400 Fernwood Road, Bethesda, Maryland, 20817. Marriott has appointed The Prentice-Hall Corporation System, Inc., 2711 Centerville Road, Suite 400, Wilmington, Delaware, 19808 as its agent for service of process as its agent for service of process.

5. On information and belief, Defendant Staples, Inc. ("Staples") is a Delaware corporation with a principal place of business at 500 Staples Drive, Framingham, Massachusetts 01702. Staples has appointed The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware, 19801 as its agent for service of process.

6. On information and belief, Defendant Starwood Hotels & Resorts Worldwide, Inc. ("Starwood") is a Maryland corporation with its principal place of business at 32 South Baltimore, Maryland, 21202. Starwood has appointed C T Corporation System, 2394 E. Camelback Road, Phoenix, Arizona 85016 as its agent for service of process as its agent for service of process.

7. On information and belief, Defendant Travelocity.com LP ("Travelocity") is a Delaware limited partnership with a principal place of business at 3150 Sabre Drive, Southlake, Texas 76092. Travelocity has appointed Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808 as its agent for service of process.

#### JURISDICTION AND VENUE

8. This is an action for patent infringement arising under the patent laws of the United States of America, 35 U.S.C. § 1, *et seq.*, including § 271. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

9. Venue is proper in this district under 28 U.S.C. §§ 1391 (b)-(d) and 1400(b) because each defendant is subject to personal jurisdiction in this district, has committed, contributed to, or induced acts of patent infringement in this district, or has a regular and established place of business in this district.

COUNT I

(Infringement of U.S. Patent No. 6,216,139)

10. Execware is the owner by assignment of United States Patent No. 6,216,139 ("the '139 patent"), entitled "Integrated Dialog Box for Rapidly Altering Presentation of Parametric Text Data Objects on a Computer Display." The '139 patent issued on April 10, 2001. A true and correct copy of the '139 patent is attached hereto as Exhibit A.

11. Amazon is directly infringing (literally and under the doctrine of equivalents) at least claim 1 of the '139 patent in this District and throughout the United States by, among other things, making, using, selling, offering to sell, or importing a computer system to rapidly format and reformat tabular displays of records or text data objects, such as Amazon's product listings at [www.amazon.com](http://www.amazon.com). For example, in returning the search results for "camera," shown below, Amazon's software initially sorts the selected text data objects and allows further sorting of the large amount of data. After being served with the Complaint in this action, Amazon has knowingly contributed to the infringement, and continues to contribute to the infringement of one or more claims of the '139 patent by offering to its customers use of its software, which constitutes a material part of the invention and is not a staple article or commodity of commerce suitable for substantial noninfringing use. Further, after being served with the Complaint in this action, Amazon has induced infringement, and continues to induce infringement, of one or more of the claims of the '139 patent, with specific intent that its software be used by Amazon's customers to infringe the '139 patent. Amazon's acts of infringement have been willful under 35 U.S.C. § 284 since the date it was served with the Complaint in this action.

amazon.com Hello, Sign in to get personalized recommendations. New customer? [Start here](#)  
 Your Amazon.com | [Today's Deals](#) | [Gifts & Wish Lists](#) | [Gift Cards](#) FREE Two-Day Shipping for College  
Presented by Toshiba  
 Your Digital Items | Your Account | Help

Shop All Departments Search **Electronics** camera GO Cart Wish List

All Electronics Brands Bestsellers Audio & Home Theater Camera & Photo Car Electronics & GPS Cell Phones & Accessories Computers MP3 Players TV & Video Deals

**Department**  
 Any Department  
**Electronics**  
 Camera & Photo (547,075)  
 Computers & Accessories (44,340)  
 Accessories & Supplies (26,148)  
 Security & Surveillance (31,466)  
 Car Electronics (1,629)  
 Portable Audio & Video (7,667)  
 eBook Readers & Accessories (479)  
 Cell Phones & Accessories (62,931)  
 Televisions & Video (1,504)  
 Office Electronics (2,653)  
 GPS & Navigation (1,185)  
 Service & Replacement Plans (96)  
 Electronics Warranties (69)  
 Home Audio & Theater (730)  
 Boat Electronics (30)

**Shipping Option** [Change Method](#)  
 Free Super Saver Shipping

**Brand**  
☐ Nikon (5,158)  
☐ Canon (3,159)  
☐ SanDisk (297)  
☐ Polaroid (1,886)  
☐ Case Logic (626)  
☐ Olympus (3,333)  
☐ Sony (6,883)  
[See more...](#)

**Avg. Customer Review**  
 ★★★★★ & Up (34,446)  
 ★★★★★ & Up (44,670)  
 ★★★★★ & Up (48,652)  
 ★★★★★ & Up (52,787)

**Certifications**  
☐ Amazon Frustration-Free (73)  
☐ Energy Star (662)  
☐ EPEAT Gold (41)  
☐ EPEAT Silver (51)  
☐ EPEAT Bronze (8)

**Condition**  
 New (744,553)  
 Used (24,418)  
 Refurbished (5,779)


**Price**  
 Under \$25 (900,958)  
 \$25 to \$50 (129,484)  
 \$50 to \$100 (43,582)  
 \$100 to \$200 (28,495)  
 \$200 & Above (49,205)  
 \$  to \$


**Seller**  
☐ PC Micro Store (167,956)  
☐ Amazon.com (49,226)  
☐ SterlingTEK (7,676)  
☐ Aodrama Camera (40,318)  
☐ Metara501 (26,689)  
☐ East Coast Photo (31,987)  
☐ ADVENTURER'S BAG (29,831)  
[See more...](#)


**Availability**  
☐ Include Out of Stock


**Electronics > "camera"**  
 Related Searches: [camera digital](#) [digital camera](#) [video camera](#)


Showing 1 - 24 of 750,251 Results Sort by **Relevance**


1.   
 Nikon Coolpix L22 12.0MP Digital Camera with 3.6x Optical Zoom and 3.0-inch LCD (Red-Primary)  
 Buy new: ~~\$59.99~~  
 45 new from \$49.00  
 Get it by Friday, Aug 19 if you order in the next 4 hours and choose one-day shipping.  
 ★★★★★ (480)  
 Eligible for FREE Super Saver Shipping.  
 See newer model of this item


2.   
 Camera & Photo  
 Digital Point & Shoot Cameras  
 Film Cameras  
 Camera Lenses  
 Digital SLR Cameras  
 Camera Cases & Bags


3.   
 Nikon COOLPIX L24 14 MP Digital Camera with 3.6x NIKKOR Optical Zoom Lens and 3-inch LCD (Red)  
 Buy new: ~~\$149.00~~ Click for product details  
 24 used & new from \$74.99  
 Get it by Friday, Aug 19 if you order in the next 5 hours and choose one-day shipping.  
 ★★★★★ (48)  
 Eligible for FREE Super Saver Shipping.


4.   
 Nikon COOLPIX L120 14.1 MP Digital Camera with 21x NIKKOR Wide-Angle Optical Zoom Lens and 3-inch LCD (Black)  
 Buy new: ~~\$279.00~~ \$273.00  
 10 new from \$239.99  
 8 used from \$239.99  
 Only 12 left in stock - order soon.  
 ★★★★★ (96)


5.   
 Nikon Coolpix L110 12.1MP Digital Camera with 15x Optical Vibration Reduction (VR) Zoom and 3.0-inch LCD (Black)  
 Buy new: ~~\$279.00~~ \$258.49  
 18 new from \$238.50  
 18 used from \$159.00  
 Only 2 left in stock - order soon.  
 ★★★★★ (256)  
 See newer model of this item


6.   
 Nikon Coolpix L22 12.0MP Digital Camera with 3.6x Optical Zoom and 3.0-inch LCD (Black)  
 Buy new: ~~\$149.00~~ \$114.95  
 15 new from \$90.00  
 2 used from \$59.00  
 Get it by Monday, Aug 22 if you order in the next 23 hours and choose one-day shipping.  
 ★★★★★ (480)  
 Eligible for FREE Super Saver Shipping.  
 See newer model of this item


7.   
 Nikon COOLPIX L24 14 MP Digital Camera with 3.6x NIKKOR Optical Zoom Lens and 3-inch LCD (Black)  
 Buy new: ~~\$149.00~~ Click for product details  
 14 new from \$39.88  
 2 used from \$39.88  
 Get it by Friday, Aug 19 if you order in the next 5 hours and choose one-day shipping.  
 ★★★★★ (48)  
 Eligible for FREE Super Saver Shipping.

8.   
 Canon PowerShot SX20IS 12.1MP Digital Camera with 20x Wide Angle Optical Image Stabilized Zoom and 2.5-inch Articulating LCD  
 Buy new: ~~\$395.00~~  
 12 new from \$395.00  
 23 used from \$279.00  
 Only 12 left in stock - order soon.  
 ★★★★★ (418)

9.   
 Nikon COOLPIX L120 14.1 MP Digital Camera with 21x NIKKOR Wide-Angle Optical Zoom Lens and 3-inch LCD (Bronze)  
 Buy new: ~~\$279.00~~ \$246.95  
 8 new from \$270.00  
 3 used from \$270.00  
 Only 2 left in stock - order soon.  
 ★★★★★ (96)

10.   
 Nikon Coolpix L110 12.1MP Digital Camera with 15x Optical Vibration Reduction (VR) Zoom and 3.0-inch LCD (Black)

11.   
 Nikon Coolpix L110 12.1MP Digital Camera with 15x Optical Vibration Reduction (VR) Zoom and 3.0-inch LCD (Black)

12.   
 Nikon Coolpix L110 12.1MP Digital Camera with 15x Optical Vibration Reduction (VR) Zoom and 3.0-inch LCD (Black)

12. CDW is directly infringing (literally and under the doctrine of equivalents) at least claim 1 of the '139 patent in this District and throughout the United States by, among other things, making, using, selling, offering to sell, or importing a computer system to rapidly format and reformat tabular displays of records or text data objects, such as CDW's product listings at www.cdw.com. For example, in returning the search results for "camera," shown below, CDW's software initially sorts the selected text data objects and allows further sorting of the large

amount of data. After being served with the Complaint in this action, CDW has knowingly contributed to the infringement, and continues to contribute to the infringement of one or more claims of the '139 patent by offering to its customers use of its software, which constitutes a material part of the invention and is not a staple article or commodity of commerce suitable for substantial noninfringing use. Further, after being served with the Complaint in this action, CDW has induced infringement, and continues to induce infringement, of one or more of the claims of the '139 patent, with specific intent that its software be used by CDW's customers to infringe the '139 patent. CDW's acts of infringement have been willful under 35 U.S.C. § 284 since the date it was served with the Complaint in this action.

CDW CDW-G CDW Canada 800.800.4239 Shopping Cart 0 Items Support Log On

**Shop CDW** **My Account** [Print This Page](#)

All Product Catalog All Categories digital camera **GO**

Products Services Solutions Center People Who Get It

**Search Results** Matches found across All Categories > Electronics > Digital Cameras & Accessories > Digital Cameras [NEED HELP?](#)

Searching Within: All CDW Products [Log on to view your pricing](#)

Showing 1 - 25 of 278 Products Sort By: Best Match 1 2 3 4 5 ... 12 Next

Compare	Product Detail	Availability	Advertised Price
<input type="checkbox"/> Compare	<b>Kodak EASYSHARE C1505 - digital camera</b> Digital camera - compact - 12.0 Mpix - supported memory: SD, SDHC - black MFG #: 8029340   CDW #: 2446351 <a href="#">See All: Digital Cameras</a>	Call	<b>\$79.99</b> <a href="#">Add To Cart</a>
<input type="checkbox"/> Compare	<b>Kodak EASYSHARE C1530 - digital camera</b> Digital camera - compact - 14.0 Mpix - optical zoom: 3 x - supported memory: SD, SDHC - white MFG #: 8908832   CDW #: 2379293 <a href="#">See All: Digital Cameras</a>	In Stock	<b>\$87.99</b> <a href="#">Add To Cart</a>
<input type="checkbox"/> Compare	<b>Canon PowerShot A800 - digital camera</b> Digital camera - compact - 10.0 Mpix - optical zoom: 3.3 x - supported memory: MMC, SD, SDXC, SDHC, MMCplus - silver MFG #: 5027B001   CDW #: 2321146 <a href="#">See All: Digital Cameras</a>	Call	<b>\$94.99</b> <a href="#">Add To Cart</a>
<input type="checkbox"/> Compare	<b>Sony Cyber-shot DSC-W530 (\$129.99- \$16.00= \$113.99 Savings ends 9/30)</b> shot DSC-W530 - Digital camera - compact - 14.1 Mpix - optical zoom: 4 x - supported memory: MS Duo, SD, MS PRO Duo, SDXC, MS PRO Duo Mark2, SDHC, MS PRO-HG Duo - black MFG #: DSCW530/B   CDW #: 2317287 <a href="#">See All: Digital Cameras</a>	In Stock	<b>\$113.99</b> <a href="#">Add To Cart</a>

**Catalog Filter**

☐ Small Business

**Brand**

☐ Canon  
☐ Casio  
☐ FujiFilm Computer Product  
☐ Hewlett Packard Printers  
☐ Intermec Technologies

**Camera Type**

☐ Compact  
☐ Mirrorless system  
☐ Prosumer  
☐ SLR

**Resolution/Megapixels**

**Optical Zoom**

**Screen Size**

**Memory Card Type**

**Optical Sensor Type**

**Battery Type**

**Price**

13. Marriott is directly infringing (literally and under the doctrine of equivalents) at least claim 1 of the '139 patent in this District and throughout the United States by, among other things, making, using, selling, offering to sell, or importing a computer system to rapidly format and reformat tabular displays of records or text data objects, such as Marriott's hotel room rental listings at [www.marriott.com/default.mi](http://www.marriott.com/default.mi). For example, in returning the search results for hotel rooms in "Los Angeles," shown below, Marriott's software initially sorts the selected text data objects and allows further sorting of the large amount of data. After being served with the Complaint in this action, Marriott has knowingly contributed to the infringement, and continues to contribute to the infringement of one or more claims of the '139 patent by offering to its customers use of its software, which constitutes a material part of the invention and is not a staple article or commodity of commerce suitable for substantial noninfringing use. Further, after being served with the Complaint in this action, Marriott has induced infringement, and continues to induce infringement, of one or more of the claims of the '139 patent, with specific intent that its software be used by Marriott's customers to infringe the '139 patent. Marriott's acts of infringement have been willful under 35 U.S.C. § 284 since the date it was served with the Complaint in this action.



Home | Change/Cancel Reservations | Country/Language | Help | Site Map

**Marriott** find & reserve EXPLORE & PLAN MEETINGS & EVENTS MARRIOTT REWARDS MY ACCOUNT Sign In

**Los Angeles Hotels** SHOW MAP HIDE MAP

**EDIT YOUR SEARCH**

City or Airport Code  
Los Angeles

State (USA only)  
California

Country  
USA

Check-in date (mm/dd/yy)  
Check-out date (mm/dd/yy)

No. of rooms Guests/room  
1 1

Marriott Rewards number  
Marriott Rewards number

☐ Use Marriott Rewards points (sign in required)

☐ Special Rates & Awards

[Modify search options](#)

**Find**

**FILTER YOUR SEARCH**

**Hotel Features:**

**City**

**Amenities**

☐ High-speed Internet (95)

☐ Free high-speed Internet (67)

☐ Free breakfast (40)

☐ Fitness center (92)

☐ Business center (84)

☐ Restaurant on-site (53)

☐ Pool (92)

☐ Kitchen/kitchenette (30)

☐ Plug In Panel (23)

☐ Pet friendly (43)

☐ Room service (37)

☐ New Lobby (22)

**Hotel Type**

**Transportation**


**Events & Meetings**

**Choose from 95 hotels across 10 brands** Sort by: Distance

**Compare Hotels** (Select Up to 4)

**1 Los Angeles Marriott Downtown** 0.6 mile(s) **VIEW RATES**

**OVERVIEW** AMENITIES EVENTS & MEETINGS GETTING HERE


 Central to the downtown Los Angeles Financial District and Civic Center. Close to many attractions including Staples Center, LA Live, Los Angeles Convention Center, Music Center, Cathedral, Dodger Stadium, Hollywood, Universal Studios and Disneyland.  
333 South Figueroa Street  
Los Angeles, CA 90071  
1 213-617-1133

✓ Fitness center  
✓ Pool  
✓ Meeting/event space

[View Hotel Website »](#)  
[View Photo Gallery »](#)

**2 JW Marriott Los Angeles L.A. LIVE** 1.3 mile(s) **VIEW RATES**

**OVERVIEW** AMENITIES EVENTS & MEETINGS GETTING HERE

 JW Marriott Los Angeles at L.A. LIVE offers travelers a front-row seat to a world-class entertainment, sports and dining epicenter. Just steps from our hotel, guests can access the STAPLES Center, Nokia Theatre, The GRAMMY Museum and so much more!

✓ Full Service Spa  
✓ Fitness center  
✓ Pool

**MARRIOTT HOTELS & RESORTS**

**JW MARRIOTT**

14. Staples is directly infringing (literally and under the doctrine of equivalents) at least claim 1 of the '139 patent in this District and throughout the United States by, among other things, making, using, selling, offering to sell, or importing a computer system to rapidly format and reformat tabular displays of records or text data objects, such as Staples' product listings at [www.staples.com](http://www.staples.com). For example, in returning the search results for "camera," shown below, Staples' software initially sorts the selected text data objects and allows further sorting of the large amount of data. After being served with the Complaint in this action, Staples has knowingly contributed to the infringement, and continues to contribute to the infringement of

one or more claims of the '139 patent by offering to its customers use of its software, which constitutes a material part of the invention and is not a staple article or commodity of commerce suitable for substantial noninfringing use. Further, after being served with the Complaint in this action, Staples has induced infringement, and continues to induce infringement, of one or more of the claims of the '139 patent, with specific intent that its software be used by Staples' customers to infringe the '139 patent. Staples' acts of infringement have been willful under 35 U.S.C. § 284 since the date it was served with the Complaint in this action.

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Store Locator | Help | **Log in**

camera **Search**

**Show All Products**

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**Low Price Guarantee** Find a lower price, we'll match it.

**Fast & free delivery on all orders over \$45.**

**Weekly Ad** Valid 9/11 - 9/17

**Camera of the Month** Olympus Tough TG-310 Digital Camera **Order now**

299 items found for "camera"

Live Chat  
M-F 8A-8P EST  
\*Pop ups must be allowed to use chat

Show: 15 items per page | 1 2 3 4 5 6 7 8 9 10 Next »

**Narrow by:**

**Cameras, Scanners, Frames**  
Digital & Film Cameras (150)  
Wired Security Cameras (14)  
Tripods & Miscellaneous Accessories (3)  
Security Systems (17)  
Wireless Security Cameras (3)  
Security Accessories (8)  
Camcorders (7)  
Child Safety Products (1)  
Camera Cases & Bags (46)  
Camcorder Cases & Bags (4)

**Brand**  
Acme Made (5)  
Canon (23)  
Case Logic (14)  
D-Link (2)  
Fuji (13)  
More  
Select more than one

**Price**  
\$0-\$300 (254)  
\$300-\$600 (33)  
\$600-\$900 (8)  
\$900-\$1,200 (2)  
\$1,200-\$1,500 (2)  
Select more than one

**Information Tools to Help You Choose**  
Find the Right Camera

**Images:** Small Large **Sort by:** Best Matches

**Olympus SZ-10 Digital Camera, Black** **\$249.99** Each Qty. 1 **Add to Cart**  
Add to Favorites  
Item 321037 Model 228730  
• 14.0 megapixels  
• 18x wide-angle optical/5x digital zoom  
• 3.0" LCD features an extra-wide viewing angle for easier composing and shooting  
• Olympus' 3D technology shoots two pictures and combines them into one image for a dramatic effect when viewed on a 3D device

**Olympus SZ-10 Digital Camera, Silver** **\$249.99** Each Qty. 1 **Add to Cart**  
Add to Favorites  
Item 927262 Model 228725  
• 14.0 megapixels  
• 18x wide-angle optical/5x digital zoom  
• 3.0" LCD features an extra-wide viewing angle for easier composing and shooting  
• Olympus' 3D technology shoots two pictures and combines them into one image for a dramatic effect when viewed on a 3D device

**FujiFilm FinePix JX300 Digital Camera** **\$109.99** Each Qty. 1 **Add to Cart**  
• 14.0 megapixels  
• 5x optical/6.7x digital zoom

Customers who searched for camera also viewed:

**SanDisk 4GB SDHC™ Card** **\$19.99** Each Qty. **Add to Cart**  
761 reviews

**SanDisk 8GB SDHC™ Card** **\$29.99** Each Qty. **Add to Cart**  
436 reviews

**PNY 2GB Premium Secure**



15. Starwood is directly infringing (literally and under the doctrine of equivalents) at least claim 1 of the '139 patent in this District and throughout the United States by, among other things, making, using, selling, offering to sell, or importing a computer system to rapidly format and reformat tabular displays of records or text data objects, such as Starwood's hotel room rental listings at [www.starwoodhotels.com](http://www.starwoodhotels.com). For example, in returning the search results for hotel rooms in "Los Angeles," shown below, Starwood's software initially sorts the selected text data objects and allows further sorting of the large amount of data. After being served with the Complaint in this action, Starwood has knowingly contributed to the infringement, and continues to contribute to the infringement of one or more claims of the '139 patent by offering to its customers use of its software, which constitutes a material part of the invention and is not a staple article or commodity of commerce suitable for substantial noninfringing use. Further, after being served with the Complaint in this action, Starwood has induced infringement, and continues to induce infringement, of one or more of the claims of the '139 patent, with specific intent that its software be used by Starwood's customers to infringe the '139 patent. Starwood's acts of infringement have been willful under 35 U.S.C. § 284 since the date it was served with the Complaint in this action.

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the Complaint in this action, Travelocity has knowingly contributed to the infringement, and continues to contribute to the infringement of one or more claims of the '139 patent by offering to its customers use of its software, which constitutes a material part of the invention and is not a staple article or commodity of commerce suitable for substantial noninfringing use. Further, after being served with the Complaint in this action, Travelocity has induced infringement, and continues to induce infringement, of one or more of the claims of the '139 patent, with specific intent that its software be used by Travelocity's customers to infringe the '139 patent. Travelocity's acts of infringement have been willful under 35 U.S.C. § 284 since the date it was served with the Complaint in this action.

The screenshot displays the Travelocity website interface for a flight search. The top navigation bar includes links for Home, Vacation Packages, Flights (selected), Hotels, Cars/Rail, Cruises, Travel Deals, Activities, and ExperienceFinder<sup>SM</sup>. A search bar on the right prompts the user to 'Search Travelocity' with a 'Go' button.

The main heading reads 'Step 1: Select a Departing Flight From Los Angeles, CA to San Francisco, CA'. Below this, the travel dates are 'Fri Sep 16, 2011 - Sun Sep 18, 2011' for '1 Adult'.

On the left sidebar, a 'Flights Starting at \$314' (Total \$335) is highlighted. Below this, a 'Flight + Hotel 2-Nights from: \$546' is shown. The 'Filter Your Results' section includes options for 'By Number of Stops' (All Flights selected, Non-Stops), 'By Time', and 'By Airlines' (All Airlines selected, Delta Air Lines, American Airlines, United, Continental Airlines, Alaska Airlines). A 'Reset Filters' button is also present.

The 'Lowest Fare Summary' table shows the following results:

Airline	Non-Stops	1 Stops	2+ Stops
Delta Air Lines	\$314 (Total \$335)	---	---
American Airlines	\$314 (Total \$335)	---	---
United	\$314 (Total \$335)	---	---
Continental Airlines	\$314 (Total \$335)	---	---
Alaska Airlines	\$314 (Total \$335)	---	---

Below the summary, a 'Sort the Flights Shown Below by:' dropdown is set to 'Price (Low to High)'.

The main flight results section displays three options, each with a 'Guaranteed Best Price' of \$314 per person (Total \$335):

- Delta Air Lines**: Flight 4593, operated by SKYWEST DBA DELTA CONNECTION. Depart: 6:30 AM Los Angeles, CA (LAX). Arrive: 7:53 AM San Francisco, CA (SFO).
- American Airlines**: Flight 1920. Depart: 7:00 AM Los Angeles, CA (LAX). Arrive: 8:20 AM San Francisco, CA (SFO).
- United**: Flight 889. Depart: 7:30 AM Los Angeles, CA (LAX). Arrive: 8:50 AM San Francisco, CA (SFO).

Each flight option includes a 'SELECT THIS DEPARTURE' button and a link to 'See Flight Details'.

A promotional banner states: 'You can SAVE up to \$525 by booking a Flight + Hotel!' with a 'SEE OPTIONS' button.

At the bottom, a 'Change Your Search' section shows the current search parameters: From: Los Angeles - LAX, To: San Francisco - SFO, Depart: 09/16/2011, and Return: 09/18/2011.

17. As a result of each defendant's infringement of the '139 patent, Execware has suffered monetary damages in an amount not yet determined, and will continue to suffer damages in the future unless each defendant's infringing activities are enjoined by this Court.

18. Unless a permanent injunction is issued enjoining each defendant and its agents, servants, employees, attorneys, representatives, affiliates, and all others acting on its behalf from infringing the '139 patent, Execware will suffer irreparable harm.

PRAYER FOR RELIEF

Execware prays for the following relief:

1. A judgment that each defendant has infringed (either literally or under the doctrine of equivalents), directly or indirectly, by way of inducing or contributing to the infringement of, one or more claims of the '139 patent;
2. A judgment that such infringement has been willful;
3. A permanent injunction enjoining each defendant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert or participation with them, from infringing the '139 patent;
4. An award of damages resulting from each defendant's acts of infringement in accordance with 35 U.S.C. § 284;
5. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Execware its reasonable attorneys' fees against each defendant;
6. An award to Execware for enhanced damages equal to treble the amount of actual damages, for the willful nature of each defendant's acts of infringement, with notice being made as least as early as the date of the filing of the complaint, as provided under 35 U.S.C. § 284;
7. A judgment and order requiring defendants to provide an accounting and to pay supplemental damages to Execware, including without limitation, pre-judgment and post-judgment interest; and
8. Any and all other relief to which Execware may show itself to be entitled.

DEMAND FOR JURY TRIAL

Execware demands a trial by jury on all issues so triable.

December 1, 2011

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